



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601

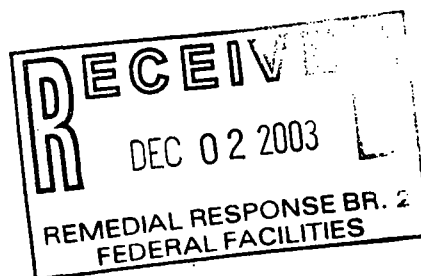
ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217-782-6760

November 26, 2003

Department of the Army
Assistant Chief of Staff for Installation Management
Army Reserve Division
600 Army Pentagon
Washington, DC 20310-0600
Attn: Major David Quivey, Project Officer



Re: Draft Construction Completion Report for Various
Site Remediations for the former Fort Dearborn Army
Reserve Center, Chicago, Illinois

0312765079 -- Cook County
Fort Dearborn Army Reserve
Superfund/Technical Reports

Dear Major Quivey:

The Illinois Environmental Protection Agency ("Illinois EPA" or "Agency") has reviewed the U.S. Army's October 20, 2003 dated responses to the Agency's comments on the *Draft Construction Completion Report for Various Site Remediations for the former Fort Dearborn Army Reserve Center, Chicago, Illinois* (Montgomery Watson Harza Americas, Incorporated) dated April 2003. These responses were received on November 3, 2003.

The Agency found most of the Army's responses acceptable. However, the Illinois EPA could not concur with some of the responses.

Agency comments on the Army's responses are as follows:

EPA Region 5 Records Ctr.



374727

1. No further comment.
2. No further comment.
3. No further comment.
4. No further comment.
5. The *Polynuclear Aromatic Hydrocarbon Background Study, City of Chicago, Illinois February 24, 2003* the Army cites in their response is just that, a study. The study does indeed target the Chicago urban area, and the area around the site is part of that urban area. However, the study is at present, not part of any published regulations. Therefore, the Agency is precluded from utilizing them as such, as the Army appears to imply. As a result, the 167 parts per billion (ppb) benzo(a)pyrene concentration which exceeded the

residential remedial objective of 90 ppb is still a concern. The Army is going to have to make a determination as to how to address this, either through additional soil removal, or to revise the land use of the property to be restricted to industrial and/or commercial.

6. No further comment.
7. The Illinois EPA was unable to locate the work plan figures (Figures 2 and 3A) the Army refers to in their response. In addition, the floor and wall confirmation samples proposed in Figure 2-3A (attached) of the work plan contradict the Army's claim the wall samples were collected at the locations and depths specified. In fact, as shown in Figure 4 of the Construction Completion Report, two of the excavation walls received no confirmatory sampling at all. It is apparent the Army disregarded Figure 2-3A of the work plan, choosing instead to locate samples as shown in Figure 2-3. However, the Illinois EPA provided Figure 2-3A as a replacement figure to clarify sample locations shown in Figure 2-3. Obviously, the Army committed to utilizing Figure 2-3A since it was part of the final work plan. But, upon completion of the sampling, nothing even faintly resembling Figure 2-3A was received. Please explain.
8. No further comment.
9. No further comment.
10. No further comment.
11. No further comment.
12. The Army's response indicates the concentrations are well within the regional background concentration range of 5,000 to 80,000 mg/kg as published by Illinois EPA in the *Technical Report, A Summary of Background Conditions for Inorganics in Soil, August 1994*. Please be advised, the Army is misquoting the document. In Table 2 of the document, a listing of the inorganic parameters is provided, including iron. For iron, a total of 105 data points were utilized from across the entire state, and the range of values from those 105 data points was 5,000 to 80,000 mg/kg. This means the lowest concentration of the inorganic parameter, iron that went into the data set was 5,000 mg/kg, and the highest concentration of iron that went into the data set was to 80,000 mg/kg. In Table G of Appendix A found in Title 35 of the Illinois Administrative Code ("35 IAC") Part 742 "Tiered Approach to Corrective Action Objectives" ("TACO"), a concentration of 15,900 mg/kg is provided as the soil background concentration of iron for counties within the Metropolitan Statistical Areas ("MSA"). This concentration is the highest background concentration of iron in soils for counties within the MSA. The Army will need to revise their argument in support of the elevated concentrations of iron

in the soils at this facility.

13. No further comment.

14. No further comment.

Please place a copy of this letter in the administrative record for this site. If you would have any questions or require additional information, please contact me at (217) 785-6020 or via e-mail at Andrew.Jankowski@epa.state.il.us

Sincerely,



Andrew J. Jankowski, Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land

REC: AJJ

RAC\CAF\AJJ\ajj\DP M\Fort Dearborn A R C\Various Site Remediations\Construction Completion
Report\Draft\RTCs\112603.doc

c: Karen Mason-Smith, SRF-6J, USEPA Region 5
John Vranicar, Ironwood Company
Doug Meadors, US Army Corps of Engineers – Louisville District